

REMARKS

Claims 1-19 are pending in the present application. Claims 1, 2 and 17-19 were amended in this response. No new matter was introduced as a result of the amendments. Support for the amendments may be found, for example on page 9, line 21 - page 10, line 10. Favorable reconsideration is respectfully requested.

Claims 1-19 were rejected under 35 U.S.C. §102(e) as being anticipated by *Shankar* (US Patent 6,768,733). Applicants respectfully traverse this rejection. Favorable reconsideration is earnestly requested.

Specifically, *Shankar* does not teach or suggest the features of directly passing on signaling messages, arriving at the at least one of the line units using a different external signaling protocol for switching of the data packets, to another of the line units with the aid of internal signaling messages defined for the signaling unit, wherein the internal signaling identifies an appropriate line unit for directly passing on signaling messages given the protocol that is required 1-2 and similarly recited in claims 17-19.

Under the amended claims, the signaling process under the present claims is done within one signaling unit by using an internal signaling protocol. The internal signaling protocol comprises the interface between the different line units of the signaling unit, where the line units process a respective external signaling protocol into an internal signaling protocol and vice versa to identify line units that are appropriate for directly processing external signaling messages.

Regarding *Shankar*, the voice calls are carried from an originating node to a terminating node over a packet-switching network, in which the voice signaling processing is separated from the processing of the voice data (col. 4, lines 19-26). For the voice signaling processing, signaling units are used at the originating and terminating side. The signaling units include three abstract machine components (OCC, UCM, TCC) which are installed for each call handled by the protocol converter (col. 5, lines 24-32). The protocol converter is set up as a virtual switch in *Shankar*, where individual protocol converters are arranged within respective signaling units (FIG. 1: 120, 140), where each protocol converter is assigned to a specific node (FIG. 1: 100, 160 - col. 5, lines 6-22).

The OCC in *Shankar* receives a signaling messages from the originating node unit and transforms them into universal protocol messages (col. 5, lines 24-35). The universal protocol messages are forwarded to the UCM, which uses them to control the originating code unit using a control link (col. 5, lines 36-40). The universal protocol messages are then transferred to the TCC, which converts them into a signaling message of the protocol that provides connectivity to the terminating signaling unit (col. 5, lines 48-53). In other words, *Shankar* teaches a signaling unit (protocol converter) that takes incoming messages and converts them in each case (OCC, UCM, TCC), to a different protocol. This is materially different from the presently amended claims that directly “pass on” signaling messages by identifying an appropriate line unit given the protocol that is required (see amended specification, pages 9-10). In *Shankar*, the protocol does not “identify” a line unit, since all of the information is converted for a terminating unit of which a connection has already been established (col. 13, lines 49-61).

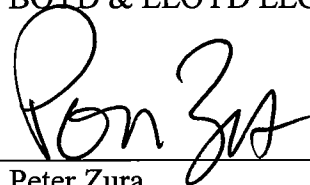
Furthermore, amended claim 1 now positively recites the line units as being optionally connected with no fixed order, which means that line units may connect to different units, depending on the protocol that is required. Thus, unlike the prior art discussed below, there is no fixed order which line unit has to be connected with a certain other line unit. As was argued previously, *Shankar* discloses that the signaling through each machine component (OCC, UCM, TCC) is performed in a fixed manner. In other words, at the start of the call, the OCC converts signals for the UCM, which in turn converts signals for the TCC. There is no identification of an “appropriate line unit given the protocol that is required” in *Shankar*, since the process through which the protocols are converted remains the same in each instance (col. 5, lines 32-53; col. 13, lines 1-61).

In light of the above, Applicants respectfully submit that claims 1-19 are in condition for allowance, which is respectfully requested. Applicants earnestly request an early Notice of Allowance. If any fees are due in connection with this application as a whole, the Examiner is authorized to deduct such fees from deposit account no. 02-1818. If such a deduction is made, please indicate the attorney docket number (0112740-273) on the account statement.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY

A handwritten signature in black ink, appearing to read "Peter Zura", written over a horizontal line.

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